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2002 APR 18 P 3:42

AZ CORP COMMISSION
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IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
SECTION 252(e) OF THE
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. RT-00000F-02-0271

QWEST'S RESPONSE TO STAFF'S REQUEST FOR A PROCEDURAL ORDER

Qwest Corporation ("Qwest"), through its undersigned counsel, hereby responds to Staff's April 9, 2002, request for a procedural order. Qwest agrees with Staff that this matter should be addressed in its own docket. Further, Qwest recognizes Staff's desire to handle this matter in an expedited fashion. Qwest, however, believes that the schedule proposed by Staff is unmanageable given resource constraints imposed by pending matters in this and other states.

This matter presents a question of national importance: What is the proper scope and application of the 90-day filing requirement of Section 252 of the 1996 Act? The resolution of this issue by the Commission, and by the other State Commissions that are currently considering this issue in Minnesota, Iowa, and New Mexico, will effect the entire fourteen-state region in which Qwest does business. Qwest respectfully suggests that a slightly modified schedule will permit the parties to examine and brief the issues with the care and thoroughness required by a question of such importance and significant impact on the manner in which ILECs and CLECs

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structure their business interactions.¹

Qwest therefore proposes that each of Staff's dates be modified as follows:

April 29, 2002	Parties to agree upon and submit a confidentiality agreement or proposed protective order
May 3, 2002	Qwest to submit all agreements into record and comment regarding its obligations under 252(e) with respect to each agreement
May 19, 2002	Interested Parties file Comment on Qwest's submissions
May 26, 2002	Qwest Reply to the Parties' Comments
June 9, 2002	Staff Report and Recommendation to the Commission
June 16, 2002	Qwest response to Staff Report and Recommendation to the Commission

In light of the foregoing, Qwest respectfully requests that the Commission issue a procedural order that includes the schedule set forth above.

DATED this 18th day of April, 2002.

QWEST LAW DEPARTMENT

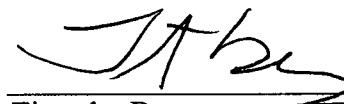
Wendy Moser

Todd Lundy

and

FENNEMORE CRAIG

By



Timothy Berg

Theresa Dwyer

3003 N. Central Avenue, Suite 2600
Phoenix, Arizona 85012

Attorneys for Qwest Corporation

¹ The Iowa Board has ordered opening briefs on the legal issues only in this matter on April 18, 2002, with replies due on April 26, 2002. The Minnesota proceeding is set for a hearing on April 29, 2002, with a briefing schedule that will extend through June 2002. The New Mexico Board has established May 10, 2002 as the deadline for motions for summary judgment, with a briefing schedule and hearings set through June 2002.

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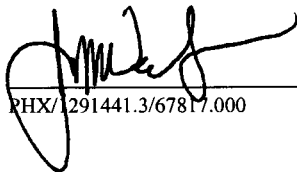
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Christopher C. Kemply
Maureen A. Scott
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ

Ernest Johnson, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ

Lyn Farmer, Chief Administrative Law Judge
Hearing Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ


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